

**Ameren Services**

**Environmental, Safety & Health**  
**314.554.2388 (Phone)**  
**314.554.4182 (Facsimile)**  
**prpike@ameren.com**

One Ameren Plaza  
1901 Chouteau Avenue  
PO Box 66149  
St. Louis, MO 63166-6149  
**314.621.3222**

May 2, 2005

Mark Friedrichs, PI-40  
Office of Policy and International Affairs  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585



**Re:      Request for Extension of Comment Period on 10 CFR Part 300, Voluntary Greenhouse Gas Reporting; Notice of Availability, 70 Fed. Reg. 15164 (March 24, 2005) and 10 CFR Part 300, RIN 1901-AB11, Guidelines for Voluntary Greenhouse Gas Reporting; Interim Final Rule, 70 Fed. Reg. 15169 (March 24, 2005)**

Dear Mr. Friedrichs:

Ameren is requesting an extension of the period to submit comments on the guidelines and other documents identified in the Department of Energy, Office of Policy and International Affairs, March 24, 2005, *Federal Register* ("FR") notices on the opportunity for public comment on draft Technical Guidelines, and interim final General Guidelines for filing voluntary reports of greenhouse gas emissions and reductions.

Ameren provides energy services to 2.3 million electric and 900,000 natural gas customers over 64,000 square miles in Illinois and Missouri. We have participated in the voluntary reporting of greenhouse gases since 1995 and believe that significant changes are being proposed to the reporting program as described in the revised Guidelines, and other associated documents. The FR notices identify that written comments must be submitted by May 23, 2005 on the referenced documents which clearly does not allow sufficient time to review and provide comments on the documents. In addition important portions (i.e., forms) of the revised program are not yet available and as stated in the April 26<sup>th</sup> DOE Public Workshop, will not be available until after the current comment period is closed.

Some of areas that we are planning to submit comments include;

- Registration versus reporting
- Status of third party offsets
- Start time for use of the revised program
- Relationship of 1605(b) program to other Federal climate programs
- Rating system
- Indirect emissions

We are working on our comments; however, we do not feel that all of the issues in these documents can not be adequately reviewed and commented on without an additional 30 to 60 days. If you have any questions, please contact me at (314) 554-2388.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul R. Pike". The signature is fluid and cursive, with the first name "Paul" and last name "Pike" clearly distinguishable.

Paul R. Pike  
Environmental Services Scientist